

April 28, 2015

### Via ECFS

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re:

WC Docket No. 10-90

Great Plains Communications, Inc., Consolidated Telecom, Inc., Consolidated

Telco, Inc. and Curtis Telephone Company

Challenge to Competitive Coverage of ATCJET.NETLLC

Dear Ms. Dortch:

On behalf of Great Plains Communications, Inc. ("Great Plains"), Consolidated Telecom, Inc., Consolidated Teleco, Inc. and Curtis Telephone Company (collectively "Consolidated"), Reynolds Schultheis Consulting, Inc. ("RSCONCO") files the attached comments to challenge the competitive coverage of ATCJET.NETLLC ("ATCJET") pursuant to the streamlined challenge process established by the Public Notice.<sup>1</sup>

Sincerely,

/s/ Jeffrey W. Rexholds

Jeffrey W. Reynolds, Principal 19116 Summershade Drive Little Rock, AR 72223

jreynolds@rsconco.com

Work:

501 830-3175

cc: Katie King, Telecommunications Access Policy Division, (via e-mail)

<sup>&</sup>lt;sup>1</sup> See Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process in Competitive Coverage, WC Docket No. 10-90, Public Notice (rel. Apr. 7, 2016) ("Public Notice")

# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of	)
	) WC Docket No. 10-90
Connect America Fund	)

## **COMPETITIVE CHALLENGE**

COMMENTS OF GREAT PLAINS COMMUNICATIONS, INC., CONSOLIDATED TELECOM, INC., CONSOLIDATED TELCO, INC. AND CURTIS TELEPHONE COMPANY CHALLENGING A-CAM COMPETITORS PURSUANT TO PUBLIC NOTICE

GREAT PLAINS COMMUNICATIONS, INC. ("Great Plains"), CONSOLIDATED TELECOM, INC., CONSOLIDATED TELCO, INC. AND CURTIS TELEPHONE COMPANY (collectively "Consolidated") hereby submits these comments regarding the Federal Communications Commission's ("FCC" or "Commission") April 7, 2016 Public Notice which published preliminary determination of unsubsidized competitive coverage for rate-of-return Incumbent Local Exchange Carrier ("ILEC") study areas. <sup>1</sup>

Pursuant to the *Public Notice* and paragraph 71 of the Report and Order, Order and Order on Reconsideration and Further Notice of Proposed Rulemaking released on March 30, 2016 in the above-reference proceedings by the FCC, <sup>2</sup> Great Plains and Consolidated challenge the competitive coverage of ATCJET.NETLLC ("ATCJET").

#### BACKGROUND AND OVERVIEW

Great Plains (SAC 371577), Consolidated Telecom, Inc. (SAC 371562), Consolidated Teleco, Inc. (SAC 371530) and Curtis Telephone Company (SAC 371536) are local exchange carriers providing voice and broadband in the state of Nebraska. These companies have a significant number of census blocks which are excluded from support by ATCJET.

ATCJET (FRN 4329314) is a fixed wireless provider operating in Nebraska. Voice Service is not available to ATCJET subscribers. On April 26, 2016 ATCJET filed a letter with the Commission via ECFS affirmatively stating that they did not provide voice service to any locations within Nebraska. A copy of that letter is included in Attachment 1 to these comments.

<sup>&</sup>lt;sup>1</sup> See Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process in Competitive Coverage, WC Docket No. 10-90, Public Notice (rel. Apr. 7, 2016) ("Public Notice")

<sup>&</sup>lt;sup>2</sup> See Connect America Fund et. al., WC Docket No. 10-90 et. al., Order, FCC 16-33 (rel. Mar. 30, 2016) ("USF Reform Order").

#### II. ADDITIONAL INFORMATION AND CONCLUSION

In addition to the letter submitted by ATCJET, Great Plains and Consolidated have compiled a list of census blocks (Attached file: *Challenges to ATCJETNET.pdf*) that were deemed ineligible for support because ATCJET was incorrectly identified as an unsubsidized competitor.

Based on the information provided, Great Plains and Consolidated respectfully request, pursuant to the *Public Notice* and paragraph 71 of the *USF Reform Order*, that the Commission correct the exclusion from support those census blocks identified in the attached file (*Challenges to ATCJETNET.pdf*).

Respectfully submitted,

s/ Jeffrey W. Reynolds

Attachments

## Attachment 1

Documentation in Support of Great Plains Communications, Inc., Consolidated Telecom, Inc., Consolidated Telco, Inc. and Curtis Telephone Company

Challenge of

ATCJET.NETLLC

ATCJET.NETLLC Letter to FCC

April 26, 2016

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, NW Room TW-A325 Washington, DC 20554

RE: WC Docket no. 10-90

In the Matter of Connect America Fund A National Broadband Plan for Our Future High-Cost Universal Service Support

Dear Ms. Dortch:

ATCJET.NETLLC ("ATCJET") is filing this letter in WC Docket No. 10-90 to inform the Commission that ATCJET does not provide voice service to any locations within the state of Nebraska.

ATCJET (FRN 4329314) is a subsidiary of Arapahoe Telephone Company ("Arapahoe"). Arapahoe is a Nebraska holding company (HocoNum 130065). While other subsidiaries of Arapahoe may offer voice service in Nebraska, voice service is not available to ATCJET subscribers directly or through another Arapahoe subsidiary.

If you have any questions, please contact me on 308-962-7298.

Respectfully submitted,

John E Koller VP/GM

Copies to:

Katie King, Wireline Competition Bureau

Jeffrey Reynolds – Reynolds Schultheis Consulting, Inc. (for Great Plains Communications, Inc., Consolidated Communications, Inc. and The Nebraska Central Telephone Company)